

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

DREW E. BURBRIDGE, et al.,)
)
 Plaintiffs,) Case No. 4:17-CV-2482 RLW
)
v.) JURY TRIAL DEMANDED
)
CITY OF ST. LOUIS, et al.,)
)
Defendants.)

DEFENDANTS' MOTION TO CONSOLIDATE DISCOVERY

Pursuant to Eastern District Local Rule 42-4.03 and
F.R.Civ.P. 42(a), defendants respectfully move the Court to
order consolidation of discovery in this cause with
discovery in the following causes now pending before the
Eastern District:

Rasheed Aldridge v. City of St. Louis, et al.
4:18-CV-01677

Fareed Alston v. City of St. Louis, et al. 4:18-CV-
01569

Amir Brandy v. City of St. Louis, et al. 4:18-CV-
01674

Brian Baude v. City of St. Louis, et al. 4:18-CV-
01564

Crystal Brown v. City of St. Louis, et al. 4:18-CV-
01676

Emily Davis v. City of St. Louis, et al. 4:18-CV-
01574

Heather DeMian v. City of St. Louis, et al. 4:18-CV-01680

Alison Dreith v. City of St. Louis, et al. 4:18-CV-01565

Michael Faulk v. City of St. Louis, et al. 4:18-CV-00308

Darryl Gray v. City of St. Louis, et al. 4:18-CV-01678

Megan Ellyia Green v. City of St. Louis, et al. 4:18-CV-01629

Mark Gullet v. City of St. Louis, et al. 4:18-CV-01571

Calvin Kennedy v. City of St. Louis, et al. 4:18-CV-01679

Lindsey Laird and Andre Roberts v. City of St. Louis, et al. 4:18-CV-01567

Derek Laney v. City of St. Louis, et al. 4:18-CV-01575

Alex Nelson and Iris Nelson v. City of St. Louis, et al. 4:18-CV-01561

Dillan Newbold v. City of St. Louis, et al. 4:18-CV-01572

Mario Ortega v. City of St. Louis, et al. 4:18-CV-01576

Christopher Robertson v. City of St. Louis, et al. 4:18-CV-01570

Keith Rose v. City of St. Louis, et al. 4:18-CV-01568

Demetrius Thomas v. City of St. Louis, et al. 4:18-CV-01566

Jonathan Ziegler v. City of St. Louis, et al.

4:18-CV-00308

The defendants have filed motions to dismiss in the foregoing causes, but in the event those motions are not granted (or granted only in part), it will facilitate the management and disposition of all such causes to require submission of consolidated sets of interrogatories and requests for production, and to require consolidated depositions of many witnesses, particularly those police officers holding command rank or having training responsibilities.

Counsel has discussed the possibility of consolidated discovery with plaintiffs' counsel. Counsel for the Burbridge plaintiffs opposes consolidation; counsel for the plaintiffs in the other causes was not in a position to agree, given the pendency of motions to dismiss. A notice of this motion is being filed in each cause.

Defendants are filing a memorandum in support of this motion concurrently herewith.

WHEREFORE defendants move that this Court order consolidation of discovery in the above-named causes, subject to the resolution of pending motions to dismiss, and to direct counsel to conduct their discovery conference under Rule 26(f) accordingly.

Respectfully submitted,
JULIAN L. BUSH
CITY COUNSELOR

/s/ Robert H. Dierker
Robert H. Dierker 23671MO
Associate City Counselor
dierkerr@stlouis-mo.gov
Abby Duncan 67766MO
Assistant City Counselor
Meghan Bruyns 69987MO
Assistant City Counselor
Amy Raimondo 71291MO
Assistant City Counselor
1200 Market St.
City Hall, Rm 314
St. Louis, MO 63103
314-622-3361
Fax 314-622-4956

CERTIFICATE OF SERVICE

I hereby certify that on January 3, 2019, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system.

/s/ Robert H. Dierker 23671MO